

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

James T. Moore and Heather A. Moore

DEBTOR.

CHAPTER 12

CASE NO.: **13-24716-JAD**

**NOTICE OF ENTRY OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that Wilmington Savings Fund Society, FSB, as trustee for Upland Mortgage Loan Trust A (“Wilmington”), unsecured creditor to the above entitled Debtor by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given of filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Michael J. Shavel, Esquire
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PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Wilmington’s (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case,

controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Condo is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: October 9, 2017

Hill Wallack LLP

By: /s/ Michael J. Shavel

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Counsel to Wilmington Savings Fund Society, FSB,
as trustee for Upland Mortgage Loan A